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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 * * *

12
13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 vs.
16 ROCCO LAZAZZARO,
17 Defendant.

2:12-cr-00485-GMN-PAL

STIPULATION TO CONTINUE
MOTION HEARING
(First Request)
(Emergency Consideration Requested)

18 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United
19 States Attorney, and Christina M. Brown, Assistant United States Attorney, counsel for the United
20 States of America, and Rene L. Valladares, Federal Public Defender, and Shari L. Kaufman,
21 Assistant Federal Public Defender, counsel for defendant ROCCO LAZAZZARO, that the Motion
22 hearing currently scheduled for March 25, 2013, at the hour of 10:00 a.m., be vacated and set to any
23 day next week; however, in no event earlier than Tuesday, March 26, 2013.

24 This Stipulation is entered into for the following reasons:

- 25 1. Defense counsel will be out of the office on an office mandated furlough day
26 during the presently scheduled hearing date and time.
27 2. Additionally, defense counsel is the attorney who has specific knowledge
28 of the case and respectfully requests a resetting of the motion hearing in this matter.

1 3. The defendant Lazazzaro is incarcerated does not object to the continuance.

2 4. The parties agree to the continuance.

3 5. The additional time requested herein is not sought for purposes of delay, but
4 merely to allow for a resetting in this matter.

5 6. Additionally, denial of this request for continuance could result in a
6 miscarriage of justice.

7 7. The additional time requested by this Stipulation is excludable in computing
8 the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,
9 United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States
10 Code, Sections 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

11 This is the first request to continue the motion hearing date filed herein.

12 DATED this 21st day of March, 2013.

13 RENE L. VALLADARES
14 Federal Public Defender

 DANIEL BOGDEN
 United States of America

15 */s/ Shari L. Kaufman*
16 By: _____
17 SHARI L. KAUFMAN
 Assistant Federal Public Defender
 Counsel for Rocco Lazazzaro

/s/ Christina M. Brown
By: _____
 CHRISTINA M. BROWN
 Assistant United States Attorney
 Counsel for the Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROCCO LAZAZZARO,

Defendant.

2:12-cr-00485-GMN-PAL

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore,
IT IS THEREFORE ORDERED that the motion hearing currently scheduled for Monday,
March 25, 2013, at the hour of 10:00 a.m., be vacated and continued to Thursday, 3/28/2013
at the hour of 9:00am

DATED 25 day of March, 2013.


UNITED STATES MAGISTRATE JUDGE